

## MEMO ENDORSED

Todd A. Spodek, Esq. Direct Dial: (347) 292-8633 ts@spodeklawgroup.com

**USDC SDNY** 

DOCUMENT

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January 31, 2022

BY ECF:

Honorable Lewis A. Kaplan United States District Judge Southern District of New York 500 Pearl Street New York, NY 10007

RE:

USA v. Joshua Burrell

Case No.: 21 Cr. 663 (LAK) Southern District of New York

Dear Judge Kaplan:

Please be advised that I represent **Joshua Burrell** in the above referenced action. As per Your Honor's Order on November 29, 2021 (<u>ECF No. 12</u>) Defense Motions are due today. My client and I are still in the process of reviewing the discovery, which includes a second production on <u>January 19</u>, 2022, and third production <u>January 28</u>, 2022.

Accordingly, I respectfully request that the current deadlines, as set forth on the docket (ECF No. 12) be adjourned, so that my client and I may have the opportunity to properly review the information contained in the Government's recent productions. I would further respectfully request that any Defense motion be due no earlier than four (4) weeks from the date of this letter.

The Government has no objection to this request. Thank you for your consideration.

Sincerely, **Spodek Law Group P.C.**/S/ Todd A. Spodek

TAS/

cc: All Counsel (By ECF).

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85 Broad Street, 17th Floor NY, NY 10004 | T: (212) 300-5196 | F: (212) 300-6371 | Mo@spodeklawgroup.com

LEWIS A KAPLAN, (ST)